

EXHIBIT A

Letter from J. Groft to Inteliquent and T-Mobile (Aug. 15, 2018)

VIA EMAIL

Fritz Hendricks
CEO
Inteliquent
10300 6th Ave North, Plymouth, MN 55441
Fritz.Hendricks@inteliquent.com

T-Mobile USA, Inc.
Rural Call Completion
callcomplaints@t-mobile.com

**Re: Rural Call Completion Issues Regarding Calls to Northern Valley
Communications, LLC**

Dear Mr. Hendricks and T-Mobile recipient:

In accordance with the FCC's Rural Call Completion Declaratory Ruling¹ and T-Mobile's Rural Call Completion Consent Decree,² I write to advise you of a rural call completion problem that requires your immediate attention.

As Mr. Hendricks is already aware, Inteliquent has been withholding payment from Northern Valley Communications, LLC ("NVC") for tariffed access charges imposed on calls that Inteliquent delivers on behalf of T-Mobile and other carriers. While Inteliquent claims that its withholding is because it has been denied the ability to install a direct connection with NVC, Inteliquent personnel have admitted to me that the withholding is an effort to exert economic pressure on NVC to obtain a below-tariff contract rate and, in fact, Inteliquent has no desire to actually install facilities to NVC's central office in South Dakota, which would be necessary to accomplish a direct connect. Thus, Inteliquent's dispute not only lacks merit, but is fraudulent. For this reason, consistent with NVC's tariff, Inteliquent's dispute has been denied in writing.

Despite the denial of Inteliquent's dispute, Inteliquent has persisted in its unlawful withholding, a clear violation of NVC's deemed lawful federal tariff which expressly prevents self-help withholding when a dispute has been denied. As a result of Inteliquent's failure to bring its account current, NVC notified Inteliquent on July 9, 2018 that it intended to disconnect Inteliquent's services unless payment was made by July 24, 2018. Ultimately, Inteliquent failed to bring its account current and additional efforts on NVC's part to resolve the dispute were rebuffed by Inteliquent.³ As such, on August 8, 2018, NVC initiated disconnect procedures as provided for in its deemed lawful tariff.

¹ *In re: Development an Unified Inter-carrier Compensation Regime; Establishing Just and Reasonable Rates for Local Exchange Carriers*, Declaratory Ruling 27 FCC Rcd. 1351 (Feb 6, 2012).

² *In re: T-Mobile USA, Inc.*, Order, File No. EB-IHD-16-00023247 (Apr. 16, 2018).

³ Mr. Hendricks scheduled a call with me on August 7, 2018, but then failed to participate in the call without any advance explanation. While Mr. Hendricks and I have since connected by phone, Inteliquent does not appear to have any intention of immediately paying its outstanding balance.

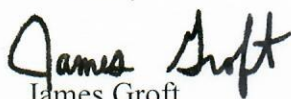
When NVC began the disconnect procedures it immediately became clear that T-Mobile had made no alternative arrangements to have its calls delivered to NVC. Instead, it is my understanding that T-Mobile permitted many calls to be dropped without completion. T-Mobile's failure to deliver its call to NVC interferes with my customers' ability to communicate with T-Mobile users. Indeed, based on evidence that has recently come to light through federal litigation, T-Mobile's failure to deliver the calls through an alternative route appears to be part of an on-going effort to suppress calls to certain free conferencing services. For that reason, NVC temporarily suspended its disconnect procedures, but I am writing to provide you with notice that those disconnect procedures will resume at **5 PM Eastern on Friday, August 17, 2018**, unless Inteliquent brings its account current before that time. Accordingly, **I hereby inform T-Mobile that it must take immediate action to ensure that its calls are routed through a carrier other than Inteliquent on or before this deadline.**

T-Mobile's failure to take reasonable measures to ensure the delivery of its traffic through an intermediary other than the non-paying Inteliquent is a violation of the Communications Act, the Rural Call Completion Declaratory Order, and the Rural Call Completion Consent Decree. Specifically, the Commission made clear that "it is an unjust and unreasonable practice in violation of section 201 of the Act for a carrier that knows or should know that it is providing degraded service to certain areas to fail to correct the problem or to fail to ensure that intermediate providers, least-cost routers, or other entities acting for or employed by the carrier are performing adequately."⁴ Moreover, the Commission has stated that "if carriers continue to hand off calls to agents, intermediate providers, or others that a carrier knows are not completing a reasonable percentage of calls or are otherwise restricting traffic. . . , that is an unjust or unreasonable practice prohibited by section 201 of the Act."⁵

Accordingly, if NVC is forced to reinstitute its disconnect procedures and experiences call failures when it does so, NVC will take legal action, either in court or with the FCC, against T-Mobile for this latest rural call completion violation.

I am in DC for meetings with the Commission today and tomorrow. However, with some advanced notice, I would be glad to schedule a call to discuss this matter with either or both of you.

Sincerely,


James Groft
CEO

cc: David Solomon, Esq. (DSolomon@wbklaw.com)
Russ Hanser, Esq. (RHanser@wbklaw.com)
David Carter, Esq. (David.carter@innovistalaw.com)

⁴ Declaratory Ruling, ¶ 12.

⁵ *Id.*